

Exhibit D

Timeline for Confirmation of Plan of Reorganization or Sale of Debtors' Assets

October 9, 2009 – Frank Higney, the Limited Purpose Fiduciary (“LPF”), executed and delivered to Debtors’ counsel a copy of an Asset Purchase Agreement (“APA”) with Una Vez Mas

October 19, 2009 – deadline pursuant to the LPF Order to file (i) proposed plan of reorganization; (ii) accompanying disclosure statement; and (iii) motion to approve bidding procedures for sale (“Bidding Procedures Motion”).

Debtors request that the Bankruptcy Court set an expedited hearing for approval of the Bidding Procedures Motion for the week of October 26 – 30. Many of the subsequent dates and deadlines will be triggered off of this the date the court approved the Bidding Procedures Motion. This bidding procedures approval date will be the “BPA Date.”

Debtors request that the court set the following hearing dates/deadlines at the hearing to approve the Bidding Procedures Motion. These dates are subject to the bankruptcy court’s schedule and are only an estimate of what Debtors believe the schedule should ultimately be.

- **Hearing on approval of the Disclosure Statement – BPA Date plus at least 35 days.**
At this hearing, the Debtors will request that the court find that the Disclosure Statement contains “adequate information” and allow the Debtors to mail the Disclosure Statement and voting ballots to creditors to vote to accept or reject the Plan. Objections to approval of the Disclosure Statement will be due fourteen (14) days prior to the Disclosure Statement approval hearing date.
 - During this time, the LPF will continue to market the assets. Notice of the proposed sale may be published in various trade periodicals and newspapers.
 - Send notice of Disclosure Statement hearing.
- Hearing to determine whether the Debtors can show that they have sufficient financing to satisfy the LPF Order’s “Financing Alternative” – **BPA Date plus at least 55 days (“Mini-Feasibility Hearing”)**. We will request that the Debtors have at least 20 days after the hearing on approval of the Disclosure Statement to prove that they have financing in an amount sufficient to pay all creditors in full based on “industry standards.”
 - Bid Deadline – BPA Date plus 65 days. Other prospective purchasers of the Debtors’ assets will be required to deliver competing bids. This will only occur if the Debtors fail to show financing at the Mini Feasibility Hearing.
 - Determination by Debtors and LPF whether competing bids are “Qualified Bids” – BPA Date plus 67 days. This will only occur if the Debtors fail to show financing at the Mini Feasibility Hearing.
 - Auction Date – BPA Date plus 70 days. This will only occur if the Debtors fail to show financing at the Mini Feasibility Hearing. The auction will take place at Andrews Kurth Houston offices.

- Selection by LPF of Successful Bidder – 3 days after the Auction Date.
- Return deposits to Qualifying Bidders not selected as the Successful Bidder – 5 days after the Auction Date.
- Execution of APA and related documents by Successful Bidder (if it is not UVM) – 6 days after Auction Date.
- Deadline to object to the sale – BPA Date plus 80 days. This will only occur if the Debtors fail to show financing at the Mini Feasibility Hearing.
- Deadline to object to confirmation – BPA Date plus 80 days. This will only be set if the Debtors have proved up the financing at the Mini-Feasibility Hearing and the Debtors are going forward with the Reorganization Confirmation Hearing (defined below).
- Voting deadline on Plan – BPA Date plus 80 days.
- Deadline to file with the bankruptcy court list of contracts to be assumed (and assigned if there will be a sale) with proposed cure claim amounts 20 days prior to Reorganization Confirmation Date or Sale Hearing (defined below). Contract counterparties shall have 10 days to object to the proposed cure claim amount.
- If the Debtors satisfy the burden and show that they have the requisite financing for the Financing Alternative, Hearing on confirmation of the plan option for the Financing Alternative – **BPA Date plus at least 85 days (the “Reorganization Confirmation Hearing”)**.
- If the Debtors do not satisfy the burden and show that they have the requisite financing for the Financing Alternative, hearing on sale of the Debtors’ assets to the winning bidder – **BPA Date plus at least 85 days (the “Sale Hearing”)**. This will be the same date as the Reorganization Confirmation Hearing but will approve the sale because (and only if) there is not financing sufficient to satisfy the Financing Alternative.
 - Sale closings. It is anticipated that there may be bifurcated closings with JBI closing its sale prior to the closing of the JB-Dallas sale.
- If the Sale Hearing goes forward, the Debtors will request that the confirmation hearing be continued until the sale actually closes (“**Sale Confirmation Hearing**”). This could be as long as 6 months to finalize the DTV build out and obtain approval from the FCC for the transfer of the licenses. Notice of Sale Confirmation Hearing will be mailed no later than 30 days prior to the Sale Confirmation Hearing.